

KING & SPALDING

King & Spalding LLP
1185 Avenue of the Americas
New York, New York 10036

Tel: +1 212 556 2100
www.kslaw.com

Andrew C. Hruska
Direct Dial: +1 212 556 2278
ahruska@kslaw.com

April 9, 2024

VIA E-FILING

Hon. Lawrence E. Kahn
U.S. District Court for the Northern District of New York

Re: Hiring of Samuel Rubinstein – Notice under Rule 1.12, New York Rule of Professional Conduct

Young America's Foundation, et al. v. Stenger, et al., 03:20-CV-0822

Dear Judge Kahn:

I write on behalf of King & Spalding LLP ("King & Spalding") and Samuel Rubinstein to inform the Court that Mr. Rubinstein, who previously served as a law clerk with the U.S. District Court for the Northern District of New York from April 2021 through March 2022, is expected to begin as an associate at King & Spalding on April 15, 2024.

Mr. Rubinstein has advised that, due to his service as a law clerk, he is conflicted from the above-referenced matter. King & Spalding represents Young America's Foundation, College Republicans of Binghamton University and Reign Bey in this case. Under Rule 1.12 of the New York Rules of Professional Conduct, Mr. Rubinstein is personally disqualified from representing anyone in connection with a matter in which he participated personally and substantially during his tenure as a law clerk. To prevent imputed disqualification of other King & Spalding attorneys, Mr. Rubinstein will be screened starting on his first day at the firm from any participation in the matter and apportioned no part of the fees therefrom. This letter is submitted to provide written notice that King & Spalding and Mr. Rubinstein are in compliance with Rule 1.12 of the New York Rules of Professional Conduct. King & Spalding will continue to represent its clients and it may properly do so under Rule 1.12(d) because:

1. King & Spalding and Mr. Rubinstein have agreed that he will be timely screened from any form of participation in the above-referenced matter, and he will not be apportioned fees therefrom.
2. The procedures being taken to screen Mr. Rubinstein from the matter are: (i) a prohibition against his speaking about the matter with or in the presence of any King & Spalding personnel; (ii) a prohibition against any of the King & Spalding personnel

April 9, 2024

Page 2

working on the matter from speaking about it in the presence of Mr. Rubinstein; (iii) a prohibition against Mr. Rubinstein from bringing to King & Spalding any documents, files, or materials in any form or medium about the matter; and (iv) a prohibition against Mr. Rubinstein accessing, reading, or reviewing any documents, files, or materials in any form or medium about the matter. King & Spalding will distribute to all personnel who are working on or in the future are added to the matter a written notification setting forth these prohibitions and their obligation to abide by them strictly.

By copy of this letter, I am notifying all parties to the matter of this ethical screen in compliance with Rule 1.12.

Very truly yours,

/s/ Andrew C. Hruska

Andrew C. Hruska